

Cohen, Dippell and Everist, P.C.

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of the Commission's Rules)	PS Docket No. 15-94
Regarding the Emergency Alert System)	EB Docket No. 04-296

Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the Notice of Proposed Rulemaking ("NPRM") regarding the Emergency Alert System released by the Federal Communications Commission ("FCC") on July 10, 2015. CDE and its predecessors have practiced before the FCC for over 70 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communications industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

In this NPRM, it is stated, *The primary purpose of the EAS is to provide the President with "the capability to provide immediate communications and information to the general public at the national, state and local levels during periods of national emergency."*

While the system delivery is being refined we note that at the last weather emergency in the District of Columbia this office employee's three cell phones communicated the weather alert about 5 minutes after the weather event had passed this firm's offices at 1420 N Street, NW

Washington, D.C. We assume that is a weather related refinement communications issue.

The point this firm wishes to make is that the Commission and/or the Federal Emergency Management Agency ("FEMA") should have a real-time contact by phone available year-round on a 24-hour (around the clock) schedule so in the event of another Zombie alert (January 2013) and/or similar phony alert is generated, a broadcast employee can immediately make contact to an authorized FCC and/or FEMA employee to determine its authenticity. If the IRS, national credit card issuers, or major retailers can be compromised by a cybersecurity event, it is only a matter of time before another more sinister attempt will be made to engage and distribute false information through the EAS. A false EAS message could be generated by a foreign entity or person who is planning some kind of mass tragic event who uses the EAS to create further havoc and confusion to the general public.

Therefore, it is urgent that the FCC in concert with FEMA make available to the broadcast community an "around the clock" year-round telephone number to immediately engage a responsible person who can confirm the authenticity of a supposedly suspicious "EAS message".

Respectfully Submitted



Donald G. Everist, PE

Date: September 11, 2015